# Before the Federal Communications Commission Washington, D.C.

In the Matter of	)	
	)	CC Docket No. 94-102
Revision of the Commission's Rules	)	
To Ensure Compatibility with Enhanced 911	)	
Emergency Calling Systems	)	
	)	

# NTELOS Inc. August 1, 2003 Interim Report for E911 Deployment Progress For Tier III Carriers

NTELOS Inc. ("NTELOS") is the parent company of its subsidiary NTELOS Wireless Inc., TRS 807074 and NTELOS Wireless Inc. is the managing partner of Virginia PCS Alliance, TRS 816030; Virginia RSA6 Cellular Limited Partnership, TRS 807081; and West Virginia PCS Alliance, TRS 818784. NTELOS submits this Interim Report as required by the Federal Communications Commission.

# 1. The number of Phase I and Phase II requests from PSAPs (including those the carrier may consider invalid):

As of July 23, 2003, NTELOS has received 86 Phase I requests and 38 Phase II requests. Some of these requests ultimately turned out to be invalid, including requests for service in areas where we do not have coverage or where the PSAP had to rescind their request. There are a number of PSAP requests that will extend beyond six months, mainly because of PSAPs requesting service before they are ready.

2. The carrier's specific technology choice (i.e., network-based or handset-based solution, as well as the type of technology used):

NTELOS has chosen a handset-based solution. Initially, NTELOS deployed Phase I requests with a mixture of CAS and NCAS solutions. Since a method for delivering Phase II services did not develop for CAS solutions, we have been engaged in a CAS to NCAS conversion process in areas where we have received Phase II requests. NTELOS has begun implementation and so far have not experienced any noteworthy problems.

3. Status on ordering and/or installing necessary network equipment:

NTELOS has chosen a third-party provider for our NCAS Phase I and Phase II deployments. As a result, much of the equipment required, other than switch features, is provided by our vendor. NTELOS has not experienced any significant problems to date with the switching equipment we have ordered/installed in regard to our E911 program. NTELOS is not aware of any equipment ordering/installation problems with our vendor.

4. If the carrier is pursuing a handset-based solution, the Report must also include information on whether ALI-capable handsets are now available, and whether the carrier has obtained ALI-capable handsets or has agreements in place to obtain these handsets:

NTELOS has not had problems in negotiation agreements or acquiring ALI-capable handsets. Nor have we had problems in marketing these handsets. However, as we

work towards deploying Phase II services, we have been told by our vendor that none of the current chipset in the ALI-capable handsets are compliant with the J36 standard in that they are unable to relay to the E911 equipment their ability to delivering location information. As a result, our vendor has developed a work around where the ESN of all ALI-capable handsets (provided to our subscribers) is input into their data base to tell the equipment the handset is capable of delivering location information. Without such a work around, the caller is only able to receive Phase I service even though they are in a Phase II deployed area and have an ALI-capable handset. The downside to this work around is for roamers. If the roamer's home carrier uses a different vendor, the ESN of their handset will not be in the data base to alert the equipment that the caller's handset is ALI capable and therefore will only receive Phase I service.

### 5. The estimated date on which Phase II service will first be available in the carrier's network:

We are targeting a September 2003 launch of Phase II services in our Eastern markets. At this point, we are unaware of any problems that can significantly delay the launch of this service.

# 6. Information on whether the carrier is on schedule to meet the ultimate implementation date of December 31, 2005:

NTELOS believes it is on schedule to meet the ultimate implementation date of December 31, 2005 for deployment of Phase II services across coverage area.

Respectfully Submitted,

NTELOS Inc.

/s/ Mary McDermott Mary McDermott Senior Vice President-Legal and Regulatory Affairs 401 Spring Lane Plaza Waynesboro, VA 22980 540-946-8677

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Cc:

Chief, Wireless Telecommunications Bureau 445 12<sup>th</sup> Street, SW Washington, D.C. 20554

Chief, Enforcement Bureau 445 12<sup>th</sup> Street, SW Washington, D.C. 20554

#### **AFFIDAVIT**

I, Mary McDermott, Senior Vice President-Legal and Regulatory Affairs, have reviewed the attached Interim Report required by the Federal Communications Commission. I attest under the penalty of perjury, that it is true and correct to the best of my knowledge.

/s/ Mary McDermott Mary McDermott Senior Vice President-Legal and Regulatory Affairs 401 Spring Lane Plaza Waynesboro, VA 22980 540-946-8677

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